



Indoor Air Quality Management Plan

2019

**District Facilities Department
Environmental Services Group**

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Saint Paul
PUBLIC SCHOOLS

Environmental Services Group

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 FP ESG NAC SEM
 FM Other

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REV	DESCRIPTION OF CHANGE	DOC APPRV.	EFF. DATE
1.0	Written Program	AV	06/01/2016
	Review	NAB	10/25/2018
	Final Review	IAQ Team	12/17/2018

DISTRICT PROGRAM FOR DEVELOPMENT AND IMPLIMENTATION OF PROCESSES TO BE USED IN SAINT PAUL PUBLIC SCHOOLS OPERATIONS

MISSION STATEMENT

The health, comfort, and learning environment of students and staff are important aspects of Saint Paul Public School's mission. Indoor Air Quality (IAQ) is a critical component of providing a healthy and comfortable learning environment. The District's IAQ goals are as follows:

1. Minimize indoor air pollutants, which will reduce the likelihood of health problems, including asthma, respiratory infections, allergic reactions, and other health problems.
2. Control temperature, humidity, and ventilation associated problems, which will foster students' ability to concentrate and learn.
3. Prevent indoor air quality problems, which will slow building deterioration, avoid school closures, minimize liability risks, and foster a positive relationship among parents, teachers, and the school administration.

Saint Paul Public Schools will meet the local and state requirements and regulations related to Minnesota Clean Indoor Air Act as well as the Asbestos Hazard Emergency Response Act (AHERA).

The District Environmental Services Group (ESG) will review the standard annually for particular requirements, which are applicable to the District and adjust this program accordingly.

This written plan is designed to be specific to the needs of users of Saint Paul Public Schools.

DEFINITIONS

AHERA	Asbestos Hazard Emergency Response Act
EPA	Environmental Protection Agency
ESG	Environmental Services Group, within the SPPS Facilities Department
HVAC	Heating, Ventilating, and Air Conditioning
IAQ	Indoor Air Quality
IPM	Integrated Pest Management
MDH	Minnesota Department of Health
MPCA	Minnesota Pollution Control Agency

ROLES AND RESPONSIBILITIES

IAQ Coordinator

Saint Paul Public Schools has identified Angela Vreeland as the IAQ Coordinator for the district. The school administration and school board is committed to providing the necessary support to meet the school district's IAQ Management Plan objectives.

The IAQ Coordinator's responsibilities include:

- Acting as the key contact person within the district to respond to and address IAQ issues and concerns.
- Coordinating the development and management of the district's IAQ Management Plan.
- Coordinating IAQ assessments
- Responding to IAQ concerns and issues that are discussed or reported.
- Coordinating the IAQ Team's activities and meetings.
- Communicating with staff, parents, and other parties regarding the process of reporting IAQ concerns.
- Coordinating the annual review of the Plan and revising the Plan to include new information.

IAQ Team

Saint Paul Public Schools has established an IAQ Team to review IAQ-related information and recommend IAQ policies to maintain and improve the air quality within district facilities and school buildings.

Led by the IAQ Coordinator, the IAQ Team is involved in the following efforts:

- Supporting the IAQ Coordinator to ensure good IAQ in all facilities and areas.
- Contributing to the IAQ Management Plan creation and implementation.
- Meeting periodically to review and resolve IAQ issues.
- Meeting annually to review the IAQ Management Plan, which includes the completion of walkthrough inspections of school buildings, key building systems evaluations, and the review of existing policies in the IAQ Management Plan.
- Meeting to evaluate and respond to IAQ concerns that have been reported to the district. The Team takes steps or recommends measures to resolve the reported concern.

See Appendix A for the individuals who are members of the IAQ Team.

Staff

All staff members play a role in improving and maintaining good IAQ:

- Teachers should refrain from interfering with airflow from ventilators (e.g., do not stack books or other items on ventilators, cover vents with posters, or turn off the fan due to noise), and minimize clutter in their classrooms.
- Administrators should communicate the school's activities to the school board, staff, students, and community. They also need to ensure that the school is implementing IAQ policies appropriately.
- Facility operators should ensure that HVAC systems are operating properly and that buildings are maintained adequately and cleaned regularly.
- Custodians should follow all policies and procedures outlined in their job descriptions to maintain a clean, comfortable, and safe environment. They should track and monitor pest and other IAQ issues.
- Health Officers/School Nurses should track illnesses, such as asthma, that may provide an early warning of IAQ problems.

IAQ PROGRAM OVERVIEW

Indoor air quality (IAQ) is a critical component of providing a healthy and comfortable learning environment. Indoor air pollutants may cause or contribute to short- and long-term health problems including asthma, respiratory tract infection and disease, allergic reactions, headaches, nasal congestion, eye and skin irritations, coughing, sneezing, fatigue, dizziness, and nausea. In addition, indoor air pollutants and extremes in temperature and humidity may cause discomfort, which can affect students' ability to concentrate and learn.

IAQ problems can hasten building deterioration, contribute to the closing of schools, create liability problems, and strain relationships among parents, teachers, school staff, unions, and the school administration.

Working with EPA and their *IAQ Tools for Schools* Program, SPPS developed an IAQ Management Plan that will help monitor and improve the quality of air in all SPPS buildings. The objectives of this IAQ Management Plan are:

- Reduce the levels of indoor air pollutants through preventive measures such as routine maintenance activities, periodic building evaluations and inspections, and IAQ-specific policies.
- Provide and maintain adequate air exchanges by maintaining ventilation equipment.
- Respond to IAQ-related concerns and problems in a thorough and prompt manner through investigation, documentation, and effective communication.

Saint Paul Public Schools performs an annual review of the IAQ Plan, in order to make appropriate changes. An annual review is necessary because changes may occur that relate to the building, operations, maintenance, occupants, and administrative priorities. Earlier versions of the IAQ Plan are retained to provide historical reference of IAQ best management practices that should reduce the likelihood of repeating policies and procedures that were ineffective or inefficient.

The annual review includes:

1. Ensuring the district has a certified IAQ Coordinator
2. Discussing issues with the IAQ Team
3. Creating a plan to address identified issues
4. Reviewing and changing the IAQ Management Plan as needed

IAQ ASSESSMENTS

At each building within the district, Space Surveys and Heating, Ventilating, and Air Conditioning (HVAC) Surveys will be conducted every three years. Space Surveys identify and document IAQ issues found in classrooms, offices, cafeterias, gymnasiums, mechanical rooms, etc. HVAC Surveys are conducted on the ventilating equipment, such as air handlers, rooftop units, and make-up air units. The surveys are equivalent to the EPA's Tools for Schools checklists. The purpose of these surveys is to standardize the process of identifying the type, location, and magnitude of apparent IAQ-related issues and problems.

Survey	Focus of Inspection
Occupied Space Survey	Classrooms, offices, kitchens, libraries, computer labs, gymnasiums, auditoriums, cafeterias, swimming pools, etc
Unoccupied Space Survey	Mechanical rooms, bathrooms, storage rooms, electrical closets, etc
HVAC Survey	Air handlers, rooftop units

The Occupied and Unoccupied Surveys check for issues related to cleanliness, pests, moisture, temperature, odors, mold, and ventilation issues. Testing parameters such as carbon dioxide, carbon monoxide, temperature, and humidity are taken within the spaces.

The HVAC survey checks air intakes, air filters, condensate pans, coils, cleanliness, mechanical rooms, dampers, air movement, and exhaust fans. The purpose is to ensure that the ventilation equipment is providing adequate fresh air to students and staff.

The surveys are focused on the following:

1. Water intrusion problems
2. Ventilation failures and/or problems
3. Building/structural failures and/or problems
4. Cleanliness of buildings and classrooms
5. Need for Preventive Maintenance programs (e.g. ventilation, carpet, building compounds)

PLAN TO ADDRESS IDENTIFIED ISSUES

During IAQ assessments, IAQ problems are identified. The IAQ Team reviews the findings and determines how to address issues. Data from the assessments are combined with known existing IAQ problems related to radon, pests, lead, water intrusion and/or moisture issues, ventilation issues, and other IAQ issues. All known issues are prioritized from most important to least important and tracked.

Issues are categorized and addressed through one or more the following methods:

1. Completing one-time repairs (immediate or near future actions).
2. Scheduling and executing mid to long- term projects.
3. Identifying deferred maintenance budget items that may be addressed if/when funding is available.
4. Adopting new policies and practices as part of the IAQ Plan annual review.

If there is a maintenance-related issue, such as a drain pan that is sloped away from a drain or a non-functional exhaust fan, a TRIRIGA work request will be created so that the proper tradesperson is assigned to the task. If the issue is complex and requires follow-up and investigation, the IAQ Coordinator will manage the process of resolution.

PROCEDURES AND PROGRAMS

The following procedures and programs were developed to prevent IAQ issues within all SPPS buildings:

Cleaning and Chemicals

Regular and thorough cleaning is an important means for the removal of air pollutant sources; however, the cleaning products themselves release chemicals into the air. Keeping flooring and furniture clean can help to minimize dust, allergens, and the likelihood of mold growth (if the flooring becomes wet).

To ensure that cleaning practices remove pollutant sources while using cleaning products appropriately, the following standards have been adopted.

- Custodial staff shall only use cleaning agents approved by the district for school use. All products must be clearly labeled and stored in a secure area. Bottles of cleaning agents must be tightly closed when stored.
- All safety data sheets are stored in an area available to all staff on the District website.
- Rooms must be kept clean. Slightly damp cloths are used to remove dust from surfaces — however, wiped surfaces should not be left damp or wet for extended periods of time, since this can cause mold growth.
- Proper mixing of chemicals is critical. Ammonia-based cleaning agents and chlorine-containing cleaners (such as bleach) must never be mixed because this generates toxic gases.
- During routine operations, pollutant-releasing activities are typically done during unoccupied hours. For example, the waxing of floors is performed during summer break.
- Areas of frequent use should be cleaned more often than areas of infrequent use.
- Large walk-off mats should be used to trap dirt and moisture at building entrances. These mats are cleaned according to manufacturers' guidelines to ensure optimal performance. Trapping dirt and moisture at building entrances helps to maintain the cleanliness of floors and carpets throughout the building.
- All carpets should be cleaned with hot water extraction at least once a year.
- Staff are not permitted to bring any cleaning products, pesticides, or other chemicals into the school. Teachers and other staff are provided a cleaner for spot cleaning.
- Teachers and other staff are encouraged to minimize clutter to ensure rooms are easier to clean and to minimize dust collecting surfaces.

Construction and Renovation

Saint Paul Public Schools considers IAQ when planning construction and renovation projects. The IAQ Coordinator, Project Manager, and design consultant should discuss major changes that may impact IAQ. The findings from walkthrough inspections and building systems evaluations should be considered when planning renovations.

To the extent possible, major renovations should be performed when school is not in session. If renovation projects must be performed while school is in session, the return air from any area being renovated should be isolated from the main ventilation system. A section for Temporary Dust Barriers (Section 01 56 15) is included in the specification for each project to contain and minimize the distribution of dust and other contaminants produced by construction activities. Cleaning operations should be more frequent during and after renovation.

The design and construction of school buildings considers various factors that impact IAQ such as:

1. Site selection (such as water drainage issues)
2. An environmental assessment of the site (such as water table level)
3. External contaminants from neighboring sites (such as farming or industrial activities)
4. Possible radon entry and use of radon resistant building materials
5. Building design factors that promote good IAQ and prevent moisture intrusion
6. Internal contaminant sources (such as asbestos or lead-based paint)
7. Space allocation (such as accessibility to HVAC areas or proper storage of chemicals)
8. Building materials and furnishing (such as selecting those that release low levels of gases, are not porous, easy to maintain, and store well)
9. HVAC system design that could affect IAQ, such as air intake and distribution, filters, coil, drain pans, ducts, positive building pressure, adequate exhaust systems, comfort, and humidity.

Microbial Management

Microorganisms, or microbes, are microscopic organisms such as mold, bacteria, and viruses. Microbes can cause illness, health symptoms, and discomfort. Microbes need moisture, a food source (such as drywall) and other particular conditions to grow. Controlling moisture levels is the easiest and most cost-effective method for preventing and managing microbial growth.

There are number of strategies the District follows to reduce moisture and thereby prevent microbial growth:

- When performing carpet extractions, especially during the summer, the following precautions are adhered to:
 - Dehumidifiers and floor fans are used after extraction to promote drying. Carpets should be dried within 24 hours to prevent microbial growth.
 - The air handlers are scheduled to run extended hours to promote drying.
 - Carpet extractions are staggered to avoid introducing too much moisture to the building. An area should be dried completely before extracting another space.
- Air handlers should be operated during the summer months at least a few hours each day. Stagnant air can lead to microbial growth.
- Building engineers notify the Facilities Department when situations arise or signs of excessive moisture occur that could lead to microbial growth including:
 - Condensation on the windows, walls, and/or flooring
 - Water leaks or water intrusion in the building
 - Inoperable air handlers
 - Buckled flooring
 - High humidity and temperature in the school

When water intrusion or a leak occurs, the following steps should be followed:

1. Isolate the water by collecting it or routing it to a nearby drain to reduce damage to building components.
2. Notify ESG and depending on the location and magnitude of the leak, ESG will visit the location to assess the severity and determine next steps.

3. The source of the water will be identified and resolved as quickly as possible.
4. Any damp or wet building components are dried within 48 hours (preferably within 24 hours). Wet/dry vacuums, dehumidifiers, and fans are available for this purpose.
5. Materials damaged by water should be replaced.

When microbial growth occurs, the following steps should be followed:

1. Notify ESG who will visit the location to assess the severity and determine next steps.
2. The room(s) containing microbial growth, as well as nearby spaces, are inspected to identify all affected locations.
3. Materials contaminated with microbes should be promptly cleaned or replaced.
 - Mold growth on porous surfaces, such as carpeting, are treated with an antimicrobial solution and cleaned thoroughly.
 - Mold growth is removed from non-porous surfaces using a diluted bleach solution, per manufacturer's recommendations, and thorough drying.
 - Remediation projects that cannot be handled by district staff are contracted to a professional.
 - Large-scale remediation projects may require specific control and protection measures.
 - Materials damaged by microbial growth should be replaced.

Microbial growth or moisture problems that are difficult to identify or remediate are contracted to a professional. The district has contracted with Institute for Environmental Assessment (IEA) and MAVO to investigate mold and moisture problems and conduct large mold clean-up projects. Large-scale remediation projects also follow the 'Construction and Renovation' guideline.

Asbestos Hazard Emergency Response Act (AHERA) Management Plan

In compliance with federal law, Saint Paul Public Schools has developed and maintains an Asbestos Hazard Emergency Response Act (AHERA) Management Plan. Information about this plan is available on the District website or by contacting ESG.

Integrated Pest Management Plan

Saint Paul Public Schools has an Integrated Pest Management (IPM) Plan that aims to reduce the frequency and magnitude of both pesticide use and pest problems. Information about this plan is available on the District website or by contacting ESG.

Hazardous Materials Management

It is important to handle hazardous materials according to the manufacturers' guidelines. Wastes generated from hazardous materials should be stored separately from regular waste and disposed of in compliance with regulations. Hazardous materials are common in art, science, and vocational/industrial classes. Training sessions for staff can help explain the risks associated with hazardous materials and the importance of complying with this guideline.

Lead in Construction

Lead can be found in paint and varnishes, in pre-1978 building structures, and possibly other materials and items. When lead is released as dust or chips, individuals may inhale or ingest the lead. This can affect the nervous system, and young children are particularly susceptible.

The District has surveyed all areas that may contain lead paint. When renovation that disturbs this paint is conducted, lead-safe work practices are employed that minimize the exposure of building occupants to airborne lead-based paint particles

Radon Gas Program

Radon is a naturally-occurring gas that can enter into school buildings from the underlying soil and build-up to levels that increase occupants' risk of developing lung cancer. MDH guidelines are followed for radon testing and mitigation. Radon testing has been performed in all ground-contact rooms, including rooms above utility tunnels in every school in the district. In 2014, radon levels were found to be below the US EPA action level of 4 pCi/L in all rooms during occupied hours. Radon testing will be conducted every 5 years or when there are major changes to the foundation or ventilation in the building, whichever is sooner.

Mercury Management

Mercury can affect the brain and nervous system. It can be found in areas where previous releases occurred, in certain building materials, in certain instruments, or stored in old containers. In compliance with MN Statute 121A.33, elemental mercury and mercury-containing instructional instruments are not permitted in our schools. Saint Paul Public Schools no longer purchases mercury containing instruments (such as

thermometers and barometers). This prohibition does not apply to light bulbs, switches, thermostats, or other mechanical equipment. In addition, school staff have evaluated all buildings for the presence of mercury containing chemicals, instruments, or materials, and have removed items which were disposed of properly.

While mercury is prohibited in our schools, in the unlikely event that mercury is brought to school, school staff are prepared to respond to a mercury release. Students will be removed from the affected area, which will then be isolated from the rest of the building. In the case of a spill in excess of 1 pound, school staff will contact the Minnesota Duty Officer (1-800-422-0798 or 651-649-5451) and possibly local authorities and the MPCA.

IAQ GUIDELINES

The following policies were developed to prevent IAQ issues within all Saint Paul Public Schools (SPPS) buildings:

Animals in the Classroom

While many teachers and students have classroom pets, animals can be a source of allergens, asthma triggers, microorganisms that may cause infectious diseases, and bites or stings. Therefore, SPPS has adopted an animal guideline that strives to minimize animal-related health problems while recognizing the positive educational role animals can have in schools.

Animals shall be housed in fully enclosed cages to prevent allergens found in dander, urine, saliva, fecal matter, and bedding from spreading throughout the classroom. Cages shall be kept away from carpets, upholstered furniture, and stuffed toys. Animal food shall be stored in airtight, sealed containers and cages shall be cleaned regularly to minimize pests, odors, allergens, and biological growth. Classroom pets should be placed away from return air ducts and from students with known allergy or asthma problems.

Specific types of animals may be restricted from the classroom if a concern is expressed by staff, students, or parents. The district also reserves the right to ban certain animals if they pose a threat to the safety or comfort of staff and students.

Food in the Classroom

Food should not be left in classrooms. When it is necessary to store food in classrooms, it must be kept in airtight, sealed hard plastic, glass, or metal containers to minimize the potential for pests, odors, and biological growth.

Plants in the Classroom

Individuals can be allergic to certain plants, such as cut flowers and flowering plants. In addition, mold can grow on the soil, plant or pot. Due to prior problems with plants in school buildings, the District has adopted a plant guideline.

Up to three plants are permitted per room. Flowers and flowering plants are discouraged; flowers delivered should be taken home at the end of the day. Staff are responsible for plants in their area, and should immediately clean up any water or dirt spills. Plants should not be over watered and cannot be placed on carpet, ventilators, or where accidental over watering can cause problems. Plants that develop mold (on leaves, on soil, or pot) must be removed. Plants should not be brought into a school that had been stored outside as there can be pests living in the soil or on the plants.

Painting

Low- or no-VOC (Volatile Organic Compound) latex, water-based paints are used for most interior applications. These paints can be used when spaces are occupied and won't exceed the permissible exposure limit set by the National Institute for Occupational Safety and Health (NIOSH). Some specific applications, such as door frames, require oil-based paint, which is only applied when spaces are unoccupied. Paints that contain mercury or lead are not permitted.

Tobacco-Free Environment – School Board Policy 414.00

Saint Paul Public Schools provides an environment free from tobacco and tobacco-related products and devices to comply with the law and protect the health of our students, employees and others in District facilities, on District grounds, and at District activities. Information about policy 414.00 is available on the District website.

School Bus Idling

Minnesota Statute § 123B.885 requires that all operators of diesel powered school buses must minimize, to the extent practical, the idling of school bus engines and exposure of children to diesel exhaust fumes. Information about bus idling is available by contacting the District Transportation Department.

ISSUE COMMUNICATION AND RESPONSE

Communication

Communication is a critical element to successful IAQ management. The IAQ Coordinator and other district authorities try to limit misinformation and confusion through the use of effective communication. In order to develop and maintain the trust of the community and staff, the IAQ Coordinator and other designated district employees should communicate with relevant parties in a prompt, honest, and courteous manner until the issue is resolved. Every time an IAQ concern is addressed or resolved, the IAQ Coordinator should report the measures taken and the resolution of the identified concern to the appropriate parties.

Upon request, the IAQ Team and Coordinator will inform parents and staff about the IAQ Management Plan and ongoing efforts.

IAQ Issue Reporting and Response

Saint Paul Public Schools encourages the reporting of IAQ concerns, regardless of how trivial the issue may seem. The prompt reporting and resolution of IAQ issues has the potential to prevent serious problems from developing, which should prevent potential health effects, discomfort, and unnecessary costs. This makes the investigation of all reported concerns worthwhile.

The IAQ Coordinator will require concerned individuals report their IAQ concern in writing. A written description of the concern should reduce misunderstanding and create a history that can be referred to at a future date. The 'IAQ Concern Form', located in Appendix B, is made available to staff and parents on the District website. This form should be completed and submitted on-line. Once submitted, the IAQ Coordinator is notified and will initiate recording of the issue.

The IAQ Coordinator uses environmental monitoring equipment and expertise from in-house trades and professionals to investigate IAQ problems. However, contractors, experts, and other outside personnel may be utilized to deal with specific issues.

If the problem cannot be identified or persists despite the school staff's efforts to identify and remediate it, the IAQ Coordinator discusses the matter with the appropriate school official(s) in order to determine next steps.

When the problem is not urgent but requires a policy change, the IAQ Coordinator organizes a meeting with the IAQ Team to develop and recommend specific policy changes. These policy changes are presented to the appropriate school officials for review and adoption. All new or revised policies are added to the existing IAQ Management Plan. All interested parties are informed about the measures taken to resolve the problem and all policy changes.

Emergency Response

An emergency is defined as an unforeseen circumstance that requires immediate action, assistance, or relief. This includes situations that are potentially life threatening, such as:

- Spills of hazardous materials;
- Complaints of severe headaches, nausea, and combustion odors; and
- Diagnosed Legionnaire's disease or tuberculosis.

In addition, emergencies include situations where there is limited time available to prevent serious property damage, such as flooding in a carpeted area or health problems.

In the unlikely event of an IAQ emergency, the district will accommodate the needs of students, parents, and staff. The Facilities Department will alert the district's Communication Department when it is necessary to provide information to a broader audience. Every effort will be made to share appropriate information as soon as it becomes available to the school district.

Contact Information

Any questions, concerns, comments, or other information regarding the District Indoor Air Quality Program can be directed to:

- ❖ The Environmental Services Group
- ❖ Phone: 651.744.1800
- ❖ Program Manager: Angela Vreeland
- ❖ Web Site: http://facilities.spps.org/health_safety
- ❖ Email: ESG@spps.org

APPENDIX

APPENDIX A – IAQ Team Members (eff. 12/17/18)

Name	Position	Contact Information
Kevin Amunrud	Lead Electrician	kevin.amunrud@spps.org 651-744-1830
Matthew Babou	Custodial Supervisor	matt.babou@spps.org 651-793-4700
Jeff Connell	Assistant Director of Facilities	jeff.connell@spps.org 651-744-1855
Gary Haider	Sheetmetal Foreman	gary.haider@spps.org 651-744-1833
Scott Hrouda	Maintenance Supervisor	scott.hrouda@spps.org 651-744-1800
Vaughn Kelly	Project Manager	vaughn.kelly@spps.org 651-744-1862
Ted Sherman	Health and Safety Program Specialist	ted.sherman@spps.org 651-744-1803
Angela Vreeland	Indoor Air Quality Coordinator	angela.vreeland@spps.org 651-744-2651

APPENDIX B – IAQ Concern Form

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Indoor Air Quality Concern Form

If you believe there is an IAQ problem in your work place, please notify the Head Engineer at your building. He or she can assess the potential cause and submit a work request to have the problem fixed. If the IAQ problem persists, the Environmental Services Group should be notified by filling out and submitting this form.

1. Site or Building Name / Address*

--Please Select--

2. If your Site is not listed above, enter OTHER SITE/PROGRAM INFORMATION here:

Site or Program Name

Street Address

Zip Code

3. Contact Person and General Information Related to Concern(s)*

Your Name

Your Job Title

Room or Area Affected

4. E-mail Address*

5. Phone Number (with dashes), in case of questions*

6. What Indoor Air Quality (IAQ) concern(s) do you have?

Please describe your concern(s) in detail

Thank you for your feedback! Environmental Services will be in contact with you to resolve the issue.

Done

Save

Cancel